

EXHIBIT A

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WELLPATH MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**ALAMEDA COUNTY MALE
PRISONERS, et al.**

Plaintiffs,

v.

**ALAMEDA COUNTY SHERIFF'S
OFFICE, et al.,**

Defendants.

Case No.: 3:19-cv-07423-JSC

**DEFENDANT WELLPATH'S
NOTICE OF TAKING
DEPOSITION OF MICHAEL
LOCKHART**

Date: **AUGUST 25, 2023**

Time: **10:00 A.M. PST**

Location:

**Law Offices of
Yolanda Huang
2748 Adeline Street
Suite A
Berkeley, CA 94703**

TO PLAINTIFFS AND THEIR COUNSEL OF RECORD HEREIN:

PLEASE TAKE NOTICE that Defendant WELLPATH, will take the deposition of **MICHAEL LOCKHART** on **FRIDAY, AUGUST 25, 2023, at 10:00 A.M. PST.**, Law Offices of Yolanda Huang, 2748 Adeline Street, Suite A, Berkeley, CA 94703.

PLEASE TAKE FURTHER NOTICE that the deposing party intends to cause the proceedings to be recorded both stenographically, before a certified court reporter, and by videotape. The deposing party specifically reserves the right to use the videotape of the

1 deposition at the time of trial. Said deposition will be taken before a duly qualified
2 certified court reporter, pursuant to the provisions of Federal Rules of Civil Procedure,
3 Rule 30, and will continue until completed, or until the end of seven hours of recorded
4 testimony, pursuant to Federal Rule of Civil Procedure 30(d)(1).

5 Respectfully submitted,

6 DATED: July 13, 2023

BERTLING LAW GROUP

7
8 /s/ Peter G. Bertling

Peter G. Bertling

9 Jemma Parker Saunders

10 Attorneys for Defendant

11 WELLPATH
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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;
ALAMEDA COUNTY FEMALE
PRISONERS And Former Prisoners, JACLYN
MOHRBACHER, ERIN ELLIS, DOMINIQUE
JACKSON, CHRISTINA ZEPEDA, ALEXIS
WAH, AND KELSEY ERWIN, et al on behalf
of themselves and other similarly situated,

Plaintiffs,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy Joe,
Deputy Ignont (sp) Jane ROEs, Nos. 1 – 25;
WELLPATH MANAGEMENT, INC., a
Delaware Corporation (formerly known as
California Forensic Medical Group) a
corporation; its Employees and Sub-
Contractors, and Rick & Ruth ROEs Nos. 26-
50; **ARAMARK CORRECTIONAL**
SERVICES, LLC, a Delaware Limited
Liability Company; its Employees and Sub-
Contractors, and Rick & Ruth ROES Nos.
51-75,

Defendants.

Case No.: 3:19-cv-07423 JSC

CERTIFICATE OF SERVICE

Action Filed: November 12, 2019
Judge: Hon. Jacqueline Scott Corley
Cttrm: E—15th Floor

3:19-cv-07423-JSC

CERTIFICATE OF SERVICE

I am employed in the County of Santa Barbara, State of California. I am over the age of 18 years and not a party to the within action. My business address is 21 E. Canon Perdido Street, Suite 204B, Santa Barbara, California 93101. My e-mail address is stephanie@bertlinglawgroup.com.

On July 13, 2023, I served a true copy of the following documents:

- **DEFENDANT WELLPATH'S NOTICE OF TAKING DEPOSITION OF MICHAEL LOCKHART**
- **DEFENDANT WELLPATH'S *THIRD AMENDED* NOTICE OF TAKING DEPOSITION OF JAMES ERIC MALLET**
- **DEFENDANT WELLPATH'S *SECOND AMENDED* NOTICE OF TAKING DEPOSITION OF ERIC LAMORE WAYNE**
- **DEFENDANT WELLPATH'S *FIRST AMENDED* NOTICE OF TAKING DEPOSITION OF TIMOTHY WAYNE PHILLIPS**

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[X] ELECTRONIC SERVICE

Based on a court order or an agreement of the parties to accept electronic service, I caused the document to be sent to the person(s) at the electronic service address(es) above.

[X] FEDERAL

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on **July 13, 2023**, at Santa Barbara, California.



Stephanie S. Aguiniga